

1 Q. What type of products did they manufacture?

2 A. They just brought out the sand that they used for -- in
3 their forms, and things like that, and some wooden
4 forms.

5 Q. Do you recall them ever bringing sludges out?

6 A. No, I don't recall them ever bringing any out.

7 Q. Do you know if Mr. Stevick ever dealt with Union Steel?

8 A. I don't know who he dealt with.

9 Q. Did you ever --

10 A. I never paid any attention to it, getting in his
11 business.

12 Q. Do you ever recall a letter from a Mr. Harvey that
13 talked about Union Steel bringing sludges to the
14 landfill?

15 A. No, I don't.

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16 Q. It discussed certain types of sludges with a toothpaste
17 like consistency, that they were disposing of at the
18 landfill. You don't recall any such letter?

19 A. No.

20 Q. Mr. Stevick never showed you any such letter?

21 A. No.

22 Q. And you have no recollection of any sludges coming to
23 the landfill?

24 A. No, not -- only sludge that I can remember is where
25 they come in with a tank truck, and dumped into the

- 1 pond.
- 2 Q. And, whose tank truck was that?
- 3 A. Well, Shelar's, for one, and I don't remember who --
- 4 just who all did come up there: wasn't very many.
- 5 Q. Shelar brought sludge to the landfill?
- 6 A. Some.
- 7 Q. And then also brought liquids?
- 8 A. Very little liquids. Mostly what they brought was that
- 9 kind of cleaning fluid, and stuff like that, that I
- 10 remember.
- 11 Q. What color was the cleaning fluid?
- 12 A. Kind of a cream colored.
- 13 Q. And, do you recall what the cleaning fluid was used
- 14 for?
- 15 A. No, I don't.
- 16 Q. Or where it came from?
- 17 A. No.
- 18 Q. They never had you sign any forms, or records?
- 19 A. No..
- 20 Q. So, did it smell, or did it have any sort of unique
- 21 characteristic?
- 22 A. Up there at the dump, there's a smell there all the
- 23 time.
- 24 Q. But, you don't recall this cream colored material
- 25 smelling?